

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GATEGUARD, INC.,

Plaintiff,

- against -

GOLDMONT REALTY CORP.,
LEON GOLDENBERG, and
ABI GOLDENBERG,

Defendants.
-----X

Civil Case No.: 1:20-cv-01609
(VEC)(GWG)

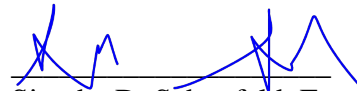
NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the affirmation of Simcha D. Schonfeld, dated February 9, 2023, together with the exhibits annexed thereto, and upon the Memorandum of Law in support, defendants LEON GOLDENBERG, and ABI GOLDENBERG (collectively, the “Defendants”), by and through their attorneys, Koss & Schonfeld, LLP, will move before the Honorable Valerie E. Caproni, in the United States Courthouse for the Southern District of New York, 40 Foley Square, Room 443, New York, New York 10007, for an order (a) pursuant to FRCP 56, granting Defendants summary judgment and dismissing the complaint of plaintiff GATEGUARD INC., and (b) granting such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, answering papers, if any, to the relief sought herein must be made in writing, filed with the Clerk of the Court and received by the Chambers of the Honorable Valerie E. Caproni, United States District Court Judge for the Southern District of New York, 40 Foley Square, Room 443, New York, and served upon Koss & Schonfeld, LLP, 160 Broadway, 8th Floor, New York, New York, 10038, in accordance with the schedule set by the Court.

Dated: New York, NY
February 9, 2023

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Simcha D. Schonfeld', is written over a horizontal line.

Simcha D. Schonfeld, Esq.

Breana Harris, Esq.

Koss & Schonfeld, LLP

160 Broadway, 8th Floor

New York, NY 10038

Direct Dial: (212) 796-8916

Attorneys for Defendants

GOLDMONT REALTY CORP.,

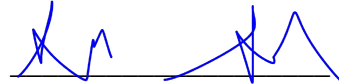
LEON GOLDENBERG, and

ABI GOLDENBERG

CERTIFICATE OF SERVICE

The undersigned certifies that on February 9, 2023, the foregoing document was filed through the CM/ECF system and thereby served electronically on counsel for Gateguard, Inc.

Dated: February 9, 2023

A handwritten signature in blue ink, appearing to read 'Simcha D. Schonfeld', is written over a horizontal line.

Simcha D. Schonfeld, Esq.

Breana Harris, Esq.

Koss & Schonfeld, LLP

160 Broadway, 8th Floor

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Attorneys for Defendants

GOLDMONT REALTY CORP.,

LEON GOLDENBERG, and

ABI GOLDENBERG